

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ABBOTT CARDIOVASCULAR)	
SYSTEMS, INC. and ABBOTT)	
LABORATORIES, INC.,)	
Plaintiffs,)	Civil Action No. 98-80 (SLR)
)	(Consolidated with C.A. No. 98-314 (SLR) and
v.)	C.A. No. 98-316 (SLR))
)	
)	REDACTED PUBLIC VERSION
MEDTRONIC VASCULAR, INC. and)	
MEDTRONIC USA, INC.)	
Defendants.)	
)	
)	

DECLARATION OF JEFF ALLEN

I, Jeff Allen, declare as follows:

1. I am the Director of Product Development for Medtronic Vascular, Inc. (“Medtronic Vascular”), a position I have held since September 2007. Prior to that time, I was a Senior Product Development Manager at Medtronic Vascular, a position I held for approximately two-and-a-half years. I have a Bachelor’s Degree and a Master’s Degree in metallurgical and materials engineering. I have personal knowledge of the matters stated herein and, if called upon, I could and would testify competently thereto.

2. I have worked on the development of coronary stents for the past ten (10) years at Medtronic Vascular. I have been the principal design engineer for the last seven generations of Medtronic Vascular stents, which include the Driver and MicroDriver. In addition to designing Medtronic Vascular’s stents, I also have been responsible for supervising the testing and reliability analysis of these stents. One of my job responsibilities as Director of Product Development is to monitor the design of competitor stents, such as Abbott Cardiovascular Systems, Inc.’s (“ACS”) Vision and Boston Scientific Corporation’s Liberte and Express2.

3. Among the many advantages of the Driver and MicroDriver bare-metal stent platform is the fact that its scaffolding has the smallest cell area between its struts of any of the currently available bare-metal stents. This feature optimizes vessel support and decreases the likelihood of tissue prolapse (or the extrusion of artery tissue through the gap in a stent's scaffolding). Acute tissue prolapse can lead to acute thrombosis. **REDACTED**

4. Other important design features of Driver/MicroDriver include its modular design with rounded struts and its cobalt-chromium material. Driver/MicroDriver's modular design results in increased deliverability and flexibility. In contrast, ACS's Vision bare-metal stent and Boston Scientific's Liberte and Express bare-metal stents are less deliverable because they are constructed of square, laser-cut struts that tend to scrape against the wall of narrow arteries. Research indicates that vascular injury caused to a vessel by the implantation of a stent often determines the degree of restenosis, and that bare-metal stents with more flexible designs (such as Medtronic's) may cause less vascular injury than stents with rigid struts. *See Exhibit B [C. Lally, Cardiovascular stent design and vessel stress: a finite element analysis, J. Biomechanics 2005; 38: 1574-81 at MDTI 09904, 9905, 9909].* Driver/Micro Driver's cobalt-chromium material is stronger and denser than the stainless steel used in Boston Scientific's stents. This

stronger and denser material permits Driver to have thinner struts resulting in increased flexibility and deliverability.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on October 26, 2007, at Santa Rosa, California.



Jeff Allen

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on November 8, 2007 I electronically filed the foregoing with the Clerk of the Court using CM/ECF which will send notification of such filing to Frederick L. Cottrell, III.

I further certify that on November 8, 2007 I served copies of the foregoing to the following counsel in the manner indicated:

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